

JUDGE BATTIS

LOCKE LORD BISSELL & LIDDELL LLP

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Attorneys for Defendants

Siméus Foods International, Inc.,

Siméus Holdings, Inc.,

PTF Acquisition Corp. and

Siméus Foods International – Forest City

08 CV 7162

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X
D.B. ZWIRN SPECIAL OPPORTUNITIES FUND
L.P. in its capacity as Administrative Agent,

08 Civ. _____

Plaintiff,

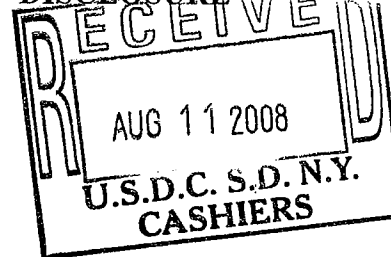
-against-

SIMÉUS FOODS INTERNATIONAL, INC.,
SIMÉUS HOLDINGS, INC., PTF ACQUISITION
CORP., AND SIMÉUS FOODS INTERNATIONAL -
FOREST CITY, INC.

Defendants.
-----X

FED. R. CIV. P. 7.1

DISCLOSURE



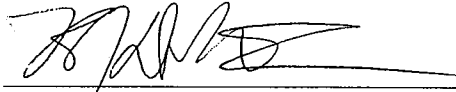
Pursuant to Rule 7.1(a) of the Federal Rules of Civil Procedure, defendants Siméus Foods International, Inc., Siméus Holdings, Inc., PTF Acquisition Corp. and Siméus Foods International – Forest City by their undersigned attorneys, Locke Lord Bissell & Liddell LLP, state that:

1. Simeus Holdings, Inc. is privately held;
2. Simeus Holdings, Inc. is the parent company of PTF Acquisition Corp.;
3. PTF Acquisition Corp. is the parent company of Siméus Foods International, Inc.;
4. Siméus Foods International, Inc. is the parent company of Siméus Foods International – Forest City;

5. None of these entities are publicly traded.

Dated: August 11, 2008

LOCKE LORD BISSELL &
LIDDELL LLP



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Siméus Foods International – Forest City*